



# Iowans for Post Office Services

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Docket N2001-1

August 16, 2011

Dear Chairman Goldway and members of the Postal Rate Commission,

I am writing here to comment on Docket N2001-1.

A few comments on statements contained in the request for an advisory opinion.

Section I: Mention is made regarding the convenient alternate access retail options that are available. It is obvious that most of the 3,650 locations on the RAO list are not within a reasonable distance to any of these existing alternate access channels. Most of the 178 locations in Iowa that are on the RAO list are small towns and rural communities. The “village Post Office” as defined in this document will only sell stamps and pre-paid Flat Rate packages. It says nothing of where small town and rural residential and business customers are to receive other services. As I have been told by USPS personnel, the rural carrier can only take packages up to 13 ounces. Most businesses regularly send packages weighing more than 13 ounces. In small towns and rural communities without other alternative access channels they are left with ineffective local service requiring them to drive what is typically a 30 min round trip to another town. This leaves them with inefficient shipping for packages. As a result many packages will not be able to be shipped in a timely manner.

Section III:

1. Top-Down Process. This seems on the surface to be a good process. If the call for a discontinuance study comes from higher in the company it should be limited to offices that meet a specific criteria and, therefore, more consistency in that decision. Looking at the RAO list this does not appear to be the case. There must be more than 2,825 Post Offices with what is considered low work load and less than \$27,500 in annual revenue. I’m sure all 2,825 meet that criteria but why were they chosen and not others that do meet that criteria.
2. Factors to trigger a study. Each stated factor may be a legitimate reason, but not in and of its self. Not one of these alone should be enough to trigger a study, it should take one of those criteria when mixed with another legitimate criteria.
4. Station and Branch Discontinuance. The patrons of these facilities deserve the same public notice and comment periods as patrons of Post offices. Public comment is an important part of the process and more time to evaluate is very good.

Page 11 has a reference to “ad hoc, isolated proposals.” This is referring to studies already in process. I don’t understand what definition of isolated they are using. There are some 2,000 offices that are being studied, which accounts for 6.25% of the 31,500 total. Eighty of those facilities are here in Iowa. Although a disproportionately higher number of offices were being studied in Iowa and West Virginia I don’t see how this can be considered isolated.

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The following comments are in reference to USPS-T-1.

Section II: B. Alternative Access Channels. Mr. Boldt refers to 35% of retail revenue coming from alternative retail access. It would be worth the time to find out what percentage of retail revenue comes from alternative retail access used by people in the areas of the 2,825 retail offices listed on the RAO. I know that a majority of the 178 here in Iowa do not have alternative access channels locally and only a small percentage of the residents in those areas would make use of the internet access.

Table 3 refers to retail locations with less than \$100,000 in WIR. Of the three categories being considered, none refer to locations with less than \$100,000 WIR. It would be better to have a table show the revenue distribution for retail locations with less than \$27,500 WIR.

On page 9 Mr. Boldt refers to a 2006 Congressional mandate to expand and market alternative retail access channels. This does not justify closing Post Offices in small towns and rural communities. Rather, to give opportunity for more services to all persons.

Section III. A. Impetus for the Initiative. Wide spread alternative access for obtaining postal services is really only true in urban and suburban areas. This access is not wide spread in small towns or rural communities. Therefore the basis of this entire section in reference to a majority of the 2,825 which are located in small towns and rural communities.

I understand that the USPS needs to make drastic changes in order for them to continue to provide Postal Services. However, closing these Post Offices will not make up the rather large deficit in their budget.

Thank you, for considering my comments on this matter.

Respectfully,

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